UNITED STATES U.S. DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

	A
CHINA UNITED LINES, LTD, a China company,	: :
Plaintiff,	NOTICE OF MOTION TO DISMISS
-against-	CIV. NO. 1-23-cv-10313-PKC
AMAZON.COM SERVICES LLC, a Delaware limited liability company,	: : :
Defendant.	: :
	: Y

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant's Motion to Dismiss Plaintiff's Second Amended Complaint, the Declaration of Robert Miller and accompanying exhibits, and all other papers and proceedings herein, Defendant Amazon.com Services LLC ("Amazon") will move this Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, on a date and time to be set by the Court, for an Order dismissing the Second Amended Complaint with prejudice pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. The basis for the motion is set forth in the accompanying memorandum of law.

Pursuant to the March 11, 2024 briefing schedule ordered by the Court (Dckt. # 18), answering papers shall be served on or before April 26, 2024, and reply papers served on or before May 13, 2024.

Dated: April 1, 2024 Respectfully Submitted,

New York, New York

K&L GATES LLP

By: <u>/s/ Benjamin I. Rubinstein</u> Benjamim I. Rubinstein 599 Lexington Ave. New York, NY 10022

Tel: (212) 536-3900 Fax: (212) 536-3901

Email: benjamin.rubinstein@klgates.com

Jeffrey C. Johnson (admitted pro hac vice)

K&L Gates LLP

925 4th Avenue, Suite 2900

Seattle, WA 98104 Tel: (206) 623-7580 Fax: (206) 623-7022

Email: jeffrey.johnson@klgates.com

Attorneys for Defendant